Regulatory Submissions in E. Format: Industry Perspective - An Overview

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Electronic Regulatory Submissions, DRA

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NOVARTIS

INDUSTRY CONNECTION

- PhRMA (Pharmaceutical Research and Manufacturers of America)
- RACC (Regulatory Affairs Coordination Committee)
  - 16 companies
  - L. Versteegh, PhD, P&G, Chairs
- ERS - WG (Electronic Regulatory Submissions Working Group)
  - 12 companies plus FDA
  - ICH perspective
  - K. Arora, PhD, Novartis, Chair
  - R. Hizer, Lilly, Co-chair

OBJECTIVES

- Minimize Preparation Time and Cost of Submissions
  - Size of each submission
  - Uniformity of submission content and format across drugs and across agencies
- Expedite Agency Review and Decisions
  - Facilitate information access
  - Facilitate writing of assessment reports

WHY?

- IN the Year 1996 Alone
  - FDA spent $5M to manage 7.5 miles of paper applications
  - Industry spent $0.5-1.0M, plus 5-6 weeks, per NDA paper application (= $25-50M)
- Paperless Electronic Submissions Make Sense Although Industry Produces Paper Efficiently

HOW TO!

- Eliminate Redundant Data/Documents
  - Clinical data or CRTs; why both?
  - PDF or WORD/WP; why both?
- Replace Paper with Electronic Version
  - Paperless Submissions by the Year 2002
- Determine and Implement E. “Standards”
- Develop and Release “Guidance”
- Maintain a Global Perspective (ICH)

Electronic Standards

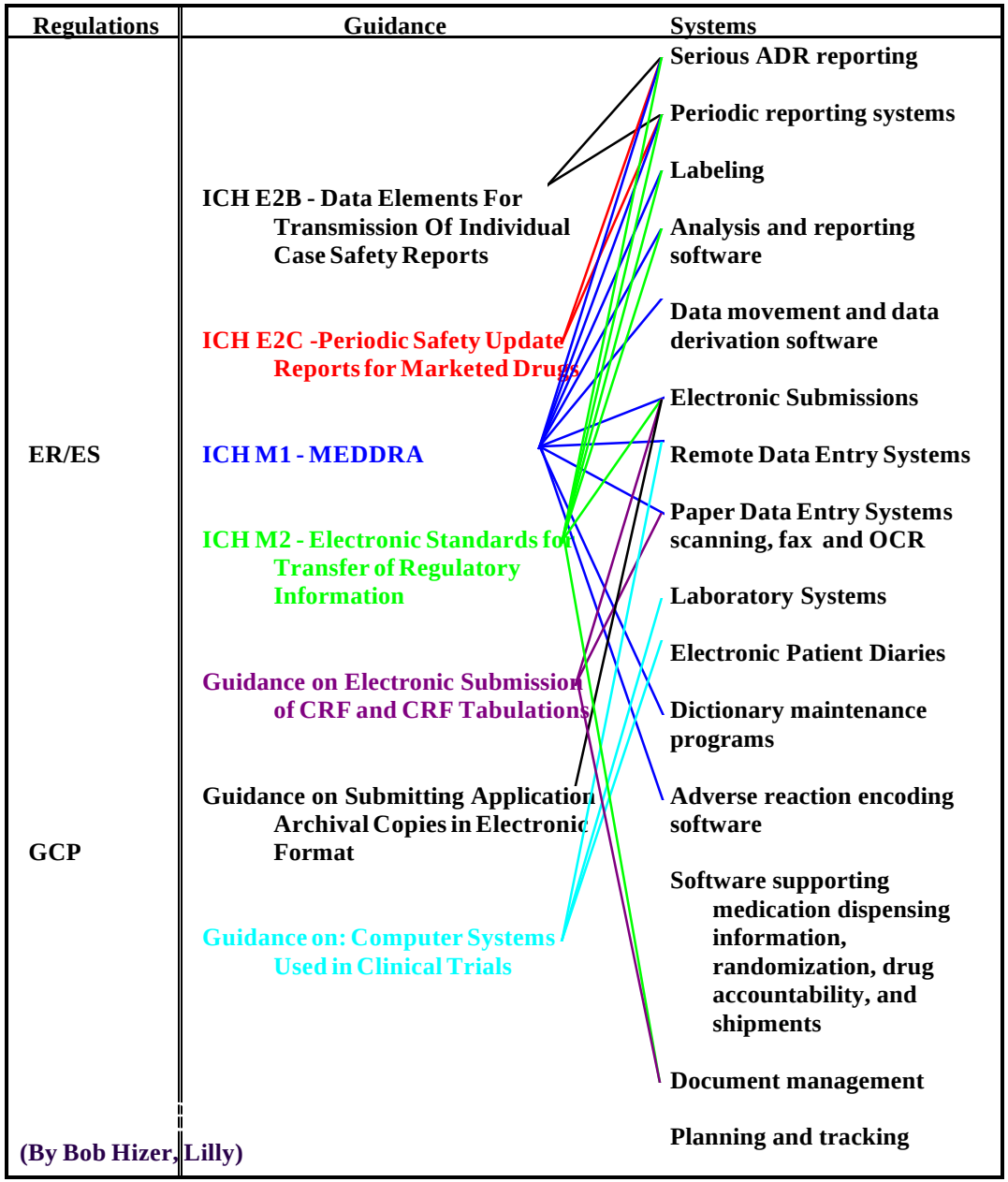
- Non-proprietary standards
  - lead to lowest denominator problems
- Proprietary standards
  - lead to version control problems
- Technology Watch
  - Leading edge technologies
  - Lagging edge technologies

CHALLENGES: Information Technology Industry

- Case Report Forms (CRFs)
  - Speed of scanning and bookmarking
  - Conversion from TIFF to PDF
  - Keyword search in PDF documents
- Case Report Tabulations (CRTs)
  - Patient level bookmarking very slow
  - Big file a problem from SAS to ASCII to WP
- PDF to WORD/WP Text for Cut-and-Paste
- Problem of Comparing PDF Documents

CHALLENGES: Pharmaceutical Industry (+CROs)

- Must Insist on Global Perspective
- Implementation of Standards and Guidance
  - Complex, requires large investment, long time
- Necessary and “Right” Thing To Do
- Each S/G Effects Multiple Systems
- Each System Effected by Multiple G/S


Regulations
Guidance
Systems
ER/ES
GCP
ICH E2B - Data Elements For Transmission Of Individual Case Safety Reports
ICH E2C -Periodic Safety Update Reports for Marketed Drugs
ICH M1 - MEDDRA
ICH M2 - Electronic Standards for Transfer of Regulatory Information
Guidance on Electronic Submission of CRF and CRF Tabulations
Guidance on Submitting Application Archival Copies in Electronic Format
Guidance on: Computer Systems Used in Clinical Trials
Serious ADR reporting
Periodic reporting systems
Labeling
Analysis and reporting software
Data movement and data derivation software
Electronic Submissions
Remote Data Entry Systems
Paper Data Entry Systems scanning, fax and OCR
Laboratory Systems
Electronic Patient Diaries
Dictionary maintenance programs
Adverse reaction encoding software
Software supporting medication dispensing information, randomization, drug accountability, and shipments
Document management
Planning and tracking
(By Bob Hizer, Lilly)

CHALLENGES: Regulatory Agencies

- Accommodate Global Viewpoint
- Come to the Electronic Age
- FDA CDER Leads:
  - Electronic CRFs/CRTs Without Paper
  - Plans for Entire NDA Without Paper
  - Coordination of Divisions within CDER
  - Coordination with CBER

CONCLUSIONS

- Excellent ROI on E. CRFs and CRTs
- What to addressed next?
- Cooperation among FDA, Industry and Vendors is essential
- Must keep in mind the COST factor
- All parties must maintain Global perspective

Regulatory Submissions in Electronic Format:
Industry Perspective - An Overview

(Krishan k. Arora, PhD, Novartis Pharmaceuticals Corporation, September 25, 1997)

It is indeed my pleasure to welcome you all at this unique conference, rather a unique workshop. I say it is unique because it is addressing a key regulation, a key time and resource consuming function - both for the FDA and for the pharmaceutical industry, a key activity that has the potential to revolutionize new drug development in the USA, and a key opportunity for Information Technology industry for innovation, entrepreneurship and business development. It is unique also because here we have under one roof a regulatory agency - the FDA, a pharmaceutical trade association - the PhRMA, and a professional association - the DIA, all three non-profit organizations cooperating to disseminate crucial information - how best to use guidance for electronic submissions of two sections of an NDA. This is only the first step towards many more to come until all sections of an NDA are possible electronically. Because, this is a workshop, attendance had to be kept limited, and you are among the lucky 200, or should I say the smart ones, to have registered early and got in. Many at the FDA have worked very hard to get the guidance document released in time for the Workshop. We appreciate their efforts especially the speakers for they had to work even harder. I believe, it will be a productive day, for industry to get many questions answered and for the FDA to receive solid feedback. So, without taking any more time, let me get on with my short presentation and give you an overview of the pharmaceutical industry perspective.

Industry Connection

Pharmaceutical Research and Manufacturers of America (PhRMA) has an active committee called Regulatory Affairs Coordination Committee (RACC) which oversees regulatory aspects of our business in USA and also collaborates with other agencies. About 16 pharmaceutical and biotech companies are members of RACC. Dr. L. Versteegh of Procter & Gamble chairs the committee. Under RACC is an Electronic Regulatory Submissions working group (ERS WG) which oversees the IT aspects of our business. It has about members from about 12 PhRMA companies and FDA. The group is active in supporting ICH-M2 (electronic transfer standards) and collaborates on several joint PhRMA-FDA information technology projects. Bob Hizer of Lilly and I co-chair ERS and are active members of ICH-M2.

Industry Objectives

Among the many objectives of the Pharmaceutical Industry here are a few that are relevant to this guidance, some are actually in line with FDA objectives. We want to minimize the time and resources required to prepare a submission. We believe this can be achieved by reducing the size of an application. Also, by making the content and format of submissions uniform from NDA to NDA and for agency to agency worldwide. After all, we are a global industry. The other equally important objective is to expedite the agency review and decision actions. We recognize this requires facilitating access to information in an application and also writing of the summary basis of approval or the assessment report, which in turn calls for special features such as browsing, cut-and-paste etc.

Why Paperless Submissions?

Why! Last year alone FDA spent almost 5 million dollars to manage 7.5 miles of paper applications. In addition, the industry spent on average, 0.5 - 1.0 million dollars and 5-6

weeks time per NDA of paper application. 7.5 miles of paper is a lot of trees, folks. Although, many in our industry have become rather efficient in producing paper submissions, paperless electronic submissions still make the most sense. But not, if it will cost more or take more time to prepare, or to review at the agency.

How To!

How do we go about achieving this! First, why not eliminate redundant data and/or documents? For example, if we are providing all clinical data electronically, why to provide CRTs - or voice-versa? Similarly, if we are providing reports in PDF format, can we not do away with Word or WordPerfect format? If electronic versions of reports are provided, why ask for paper copy as well? We support CDER director Dr. Janet Woodcock's goal of paperless submissions by the year 2002, even though some of us may not be fully ready by then. We welcome electronic standards, we welcome guidance - such as the guidance of today, but we also urge that the global perspective be maintained, because none of us, not even the number one company Novartis, which I work for, wants to or can afford to file different formats of the same submission in different countries. Hopefully, the ICH Common Technical Document expert working Group will resolve the content and the format differences among regions.

Electronic Standards

As an active member of the ICH-M2 expert working group on electronic standards, I have witnessed spending endless hours searching non-proprietary standards and debating their practical merits and demerits. Whereas, agency representatives find themselves caught not to favor one proprietary solution over another, the industry representatives find proprietary solutions often more palatable - with some assurances of course, such as viability of vendors and version control of software etc. No matter what standard are adopted, there will always be a need to switch to leading edge technology solutions as they become available; and there will always be a need to continue support of lagging edge technology solutions in order to keep the small companies afloat, or where and when a leading edge solution may not be cost effective anymore more.

Challenges for IT Industry

That leaves us with some very specific challenges for all three parties. IT industry needs to find solutions for FAST, I repeat FAST, scanning of CRFs and fast creation of bookmarks. Many CRF images are in TIFF, their conversion to PDF- FAST and inexpensive conversion - is still a challenge. Searching CRFs in PDF by key words still begs for an easy solution. Similarly, creating bookmarks in a large CRT table, by say patient ID, is slow; converting SAS output of a large CRT to ASCII and/or to WP for printing has been a big headache. Printing jobs for large listings or tables abort more often than not. Cut-and-paste from PDF to Word or WP for editing is slow and cumbersome for text, and worst for tables, even with use of popular plug-ins. There is just no practical way for one to compare electronically two versions of a PDF document, whereas it is a piece of cake for Word or WP versions.

Challenges for Pharmaceutical Industry

For pharmaceutical industry, it is not a happy challenge to deal with - with so many regional preferences. Converting same report into PDF for US, into HTML for SEDAMM in France, into DAMOS for Germany, into SGML for MERS in Canada etc., are just too many to deal with. Implementation of various standards and guidance requires considerable amount of time

and a sizable investments in IT, for SOPs, and for personnel. Never-the-less, it is the right thing to do and the pay back could be worthwhile.

As you can see from the next slide, each standard or guidance affects many systems and every system is affected by many standards and guidance.

Shear management of modifications to these systems could cost arm and length. The impact of "FDA 21 CFR Part 11 electronic ; electronic record; the final rule" to make all GxP systems maintain computerized audit trails could cost millions of dollars; this is no exaggeration.

Challenges for the FDA

Challenges for FDA are just as difficult but also is the "right thing to do". I think, I have already emphasized enough the global viewpoint, which is just as important for the FDA. I am also pleased to note that the CDER director Dr. Woodcock fully agrees with the global aspects and the message is tickling down in her organization. FDA must continue to enhance the IT environments. CDER is leading the way with electronic CRFs and CRTs which is to follow with other sections. This must happen in all divisions and in CBER.

Conclusions

Return on investment of electronic CRFs and CRTs is good. At Novartis, we have found their cost to be considerably less than submitting paper, even when we paid an outside vendor company to create electronic. CRFs and CRTs. The obvious question is what other sections of NDA should be next? We encourage you to help prioritize additional sections where you think the impact will be high. Cooperation between FDA, pharm and IT industry, and I don't mean to leave out CROs, is important, although we still need to keep certain distance between us because of the potential conflict of interest. Cost factor is very important for all three parties, and it is the best incentive for CEOs. And, once again, let us maintain the global perspective. Thank you.